

FILED

NOV - 2 2022

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
v. ) No. **4:22-CR-615-SEP/JMB**  
)  
DANIEL ROSTAS, )  
a/k/a Daniel Razneas )  
a/k/a Sorin Coman, )  
LEGENDA ROSTAS, )  
a/k/a Evelin Gomez, and )  
LOREDANA ANGEL, )  
a/k/a Denisa Angel, )  
)  
Defendants. )

**INDICTMENT**

**COUNT ONE**

(Conspiracy to Commit Wire Fraud)

The Grand Jury charges:

A. **The Scheme to Defraud**

1. From on or about at least June 12, 2022, through October 14, 2022 defendants DANIEL ROSTAS, LEGENDA ROSTAS, and LOREDANA ANGEL, knowingly executed and attempted to execute a scheme and artifice to defraud major retail business, to include Target, in the Eastern District of Missouri and throughout the United States, by means of materially false and fraudulent pretenses, representations and promises, those being the amount of currency paid to obtain gift cards from the retailers.
2. Using various techniques, the defendant(s) entered retail stores and purchased various Visa Prepaid gift or debit cards in various values. At the register a defendant counted currency

for the full value of the cards to be purchased. They passed currency back and forth between the cashier and themselves. During the final time when the defendants held currency, they manipulated a portion of the currency and concealed a portion of it from the cashier. In turn, the cashier placed the currency that was provided by the defendant(s) in the drawer, believing it to be the total amount required for the purchase as falsely and fraudulently represented by the defendant(s). In the end, the defendant(s) paid only a fraction of the value of the Visa Prepaid credit or debit cards.

**B. Conspiracy**

3. Beginning in or before June 12, 2022, and continuing to on or about October 14, 2022, in the Eastern District of Missouri and elsewhere, the defendants,

**DANIEL ROSTAS,  
a/k/a Daniel Razneas, a/k/a Sorin Coman,  
LEGENDA ROSTAS, a/k/a Evelin Gomez,  
and  
LOREDANA ANGEL, a/k/a Denisa Angel**

and persons, known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree with each other and persons, known and unknown to the Grand Jury, to commit the following offenses against the United States: that being, to devise or intending to devise a scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, transmitted and caused to be transmitted by means of wire communications in and affecting interstate or foreign commerce, certain writings, signs, signals, pictures, and sounds, for the purpose of knowingly executing and attempting to execute, the scheme and artifice in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Section 1349.

**COUNT TWO**  
(Illegal Reentry)

The Grand Jury further charges that:

On or about October 14, 2022, in the Eastern District of Missouri, the defendant,

**DANIEL ROSTAS,**  
**a/k/a Daniel Razneas, a/k/a Sorin COMAN,**

an alien, was found in the United States after having been removed therefrom on or about November 13, 2019, and again on October 14, 2020, to Romania, without having obtained the express consent of the Attorney General of the United States or the Secretary of Homeland Security to reapply for admission to the United States.

In violation of Title 8, United States Code, Section 1326(a)

**COUNT THREE**  
(Illegal Reentry)

The Grand Jury further charges that:

On or about October 14, 2022, in the Eastern District of Missouri, the defendant,

**LEGENDA ROSTAS,**  
**a/k/a Evelin Gomez**

an alien, was found in the United States after having been removed therefrom on or about December 28, 2020, to Romania, without having obtained the express consent of the Attorney General of the United States or the Secretary of Homeland Security to reapply for admission to the United States.

In violation of Title 8, United States Code, Section 1326(a)

**COUNT FOUR**  
(Illegal Reentry)

The Grand Jury further charges that:

On or about October 14, 2022, in the Eastern District of Missouri, the defendant,

**LOREDANA ANGEL,  
a/k/a Denisa Angel**

an alien, was found in the United States after having been removed therefrom on or about June 24, 2019, to Russia, without having obtained the express consent of the Attorney General of the United States or the Secretary of Homeland Security to reapply for admission to the United States.

In violation of Title 8, United States Code, Section 1326(a)

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Sections 1343 and 1349 as set forth in Count One, the defendants shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to said offense.
2. Specific property subject to forfeiture includes, but is not limited to, the following:
  - a. a 2017 Chrysler Pacifica, Color: White, VIN: 2C4RC1EG4HR542133;
  - a. \$10,567.00 cash; and
  - b. \$11,300.00 in Visa Prepaid gift cards.
3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

SAYLER A. FLEMING  
United States Attorney

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KENNETH R. TIHEN, #37325  
Assistant United States Attorney